

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ALBEMARLE CORPORATION,

Plaintiff,

v.

OLIN CORPORATION,

Defendant.

Civil No. 1:23-cv-600

DEFENDANT OLIN CORPORATION'S MOTION TO DISMISS

Defendant Olin Corporation ("Olin"), by counsel, pursuant to Fed. R. Civ. P. 12(b)(6), hereby moves to dismiss, with prejudice, the Complaint filed by Plaintiff Albemarle Corporation ("Albemarle") in its entirety. The Complaint filed by Albemarle fails to state a claim upon which relief can be granted. To wit, Albemarle has failed to present plausible allegations of monopoly power or its dangerous probability, monopolistic exclusion, or an antitrust injury. Olin submits the attached Memorandum in support of its Motion.

Dated: May 26, 2023

Respectfully submitted,

/s/ Corey Roush

Corey W. Roush (*pro hac vice* pending)

Robert G. Lian Jr. (36406)

AKIN GUMP STRAUSS HAUER & FELD
LLP

2001 K Street, N.W.

Washington, DC 20006

Tel: (202) 887-4115

Fax: (202) 887-4288

croush@akingump.com

blian@akingump.com

Counsel for Defendant Olin Corporation